



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

September 21, 2004

David Phillips
Nevada Power Company
6226 West Sahara Avenue
MS 30
Las Vegas, NV 89102-3032

Facility: Reid Gardner Generating Station Moapa, NV Facility ID: H-000530

Reference: *Corrective Action Plan for Ponds F and H, Nevada Power Company, Reid Gardner Station, Moapa, Nevada* (dated September 10, 2004)

Dear Mr. Phillips:

The Nevada Division of Environmental Protection (NDEP) has received and reviewed the referenced corrective action plan (CAP) submitted by Nevada Power Company and has the following comments:

Clarification is needed on the current construction of Ponds F and G. Are Ponds F and G constructed on compacted native clay soils or with an engineered clay liner?

Table 1, which lists the established action levels for the chemicals of concern at Reid Gardner Station, contains two errors. Please note that the established action levels for beryllium and boron are 0.004 and 1.4 milligrams per liter, respectively.

In section 3.0, the CAP states that "Because of the residual pond water and saturated sediments that remained under the cap, it was necessary during fly ash removal to excavate temporary sumps and install sump pumps along the northwest side of Pond G...". Please discuss what type of cap was on Pond G, in addition to how, when, and why the cap was constructed.

The NDEP concurs with the proposed remedial approach detailed in the November 11, 2002 CAP submitted by NPC with the following exceptions, changes, and/or conditions:

- **Please consider placing the drain piping approximately 2 feet below the historical low-point groundwater elevation measurement from the perimeter wells. In addition, consider continually pumping to promote flow through the system. The NDEP believes that an active remediation system is required for this area; therefore, the drain system should not rely on gravity flow.**
- **Adequate pond capacity should be made available by including any additional inflow generated by the drain system into the water balance for plant operations.**

David Phillips
Nevada Power Company
H-000530, Second Quarter 2004 Report Response
September 21, 2004
Page 2 of 2

- **Sampling of the sumps should be conducted on a quarterly schedule to monitor system effectiveness.**

Please contact the undersigned with any questions or comments about this letter at (702) 486-8267 or sharbour@ndep.nv.gov.

Sincerely,

Shannon Harbour, EI
Staff Engineer
Remediation and LUST Branch
Bureau of Corrective Actions, NDEP

SH:sh

cc: Jim Najima, Chief, Bureau of Corrective Actions, NDEP, Carson City, NV
Todd Croft, Supervisor, Bureau of Corrective Actions, NDEP, Las Vegas, NV
Rob Saunders, Bureau of Water Pollution Control, NDEP, Carson City, NV
Diana Silsby, Bureau of Water Pollution Control, NDEP, Carson City, NV
Doug Joslin, Clark County Health District, PO Box 3902, Las Vegas, NV 89127-0902
Tony Garcia, Nevada Power Company, PO Box 98910 MS 30, Las Vegas, 89151-0001
Richard Willer, Nevada Power Company, PO Box 230 MS 25, Las Vegas, 89151-0001